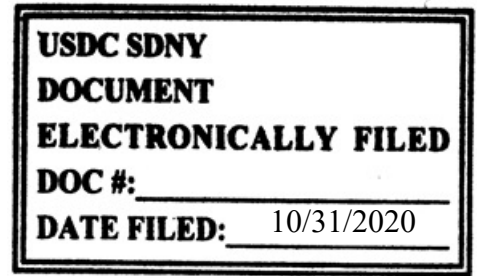


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October 30, 2020

Magistrate Judge Stewart D. Aaron
United States District Court
Southern District of New York
40 Foley Square New York, NY 10007

Re: *Greer v. Carlson, et al*, Civil Action No. 1:20-cv-05458 (LTS)(SDA)

Motion to Depose Carlson

Dear Judge Aaron:

I am the *pro se* Plaintiff and am writing this letter motion **for permission to depose Tucker Carlson** with the focused pursuit of jurisdictional discovery. As detailed in my letter sent to chambers, Carlson has decided to engage in spoliation by refusing to produce even basic documents or answer routine interrogatory. In contrast, Jennifer Strasburg has agreed to provide many of the same documents. Therefore, I will need to depose Carlson.

I believe that I can accomplish my goals with a brief two-hour deposition via remote video. The questions would be very similar to the interrogatory questions.

In my opinion, it is best for this case that the entirety of jurisdictional discovery be completed now, rather than have lingering questions to cloud the outcome. The answers I seek are fair and reasonable. Tucker Carlson is not above the law.

Of note, based on the interrogatory responses that indicate their motion to dismiss strategy will fail, I offered the defendants the chance withdraw their motion and proceed to the motion on pleadings that will deal with the blacklisting and theft of my property. However, they declined the offer.

Sincerely,

Steven Greer
Steven Greer

ENDORSEMENT: Plaintiff's request to depose Defendant Carlson is DENIED. The Court just entered an Order regarding the interrogatories and document requests to which Carlson shall respond (ECF No. 97). The information and documents to be provided in response to such Order, in the Court's view, is proportional to the needs of the case. SO ORDERED.

Dated: 10/31/2020

Stewart D. Aaron